

Exhibit G

Gangnes, Larry

From: Yeager, Judy <Judy.Yeager@delphi.com> on behalf of Papelian, Joseph E <joseph.e.papelian@delphi.com>
Sent: Wednesday, January 21, 2015 8:34 AM
To: vick@cuneolaw.com; Gangnes, Larry; blondon@fkmlaw.com; wburns@susmangodfrey.com; Davis, Kenneth R.; oochoa@susmangodfrey.com
Cc: Frantangelo, Barbara K; Gruber, Douglas R
Subject: Call regarding Delphi

All:

Thursday, February 5th starting at 11:00 am until 2:00 pm coordinates with the requests below and the Delphi participants. This will be held at the Delphi Office, 5725 Delphi Dr., Troy MI 48098. I will transmit a meeting notice to add to your calendars.

Regards,

Judy on behalf of Joe Papelian

Judy Yeager
Delphi Legal – Litigation
5725 Delphi Drive
MC: 483.400.554
Troy MI 48098
judy.yeager@delphi.com
1.248.813.2106 (Office)
1.248.813.1122 (Fax)

From: Vicky Romanenko [<mailto:Vicky@cuneolaw.com>]
Sent: Thursday, January 15, 2015 4:18 PM
To: Gangnes, Larry; Papelian, Joseph E; Yeager, Judy
Cc: Billy London (blondon@fkmlaw.com); Omar Ochoa (OOchoa@susmangodfrey.com); Warren T. Burns; Frantangelo, Barbara K; Davis, Kenneth R.; Yeager, Judy
Subject: RE: Call regarding Delphi

We are available February 4 and 5. We would like to propose that we begin at 11 am, ET.

Joe, can you also give us an idea of the likely duration of the meeting?

We continue to believe that it is important for us to understand what data and documents Delphi has, in order for us to continue our negotiations. If Delphi would prefer not to schedule a call before the meeting then we ask that you provide us with this information via correspondence or at the meeting.

From: Gangnes, Larry [<mailto:GangnesL@LanePowell.com>]
Sent: Thursday, January 15, 2015 11:20 AM
To: Papelian, Joseph E; Vicky Romanenko; Yeager, Judy
Cc: Billy London (blondon@fkmlaw.com); Omar Ochoa (OOchoa@susmangodfrey.com); Warren T. Burns; Frantangelo, Barbara K; Davis, Kenneth R.; Yeager, Judy
Subject: RE: Call regarding Delphi

We are available the week of Feb. 2.

From: Papelian, Joseph E [<mailto:joseph.e.papelian@delphi.com>]
Sent: Tuesday, January 13, 2015 9:14 AM
To: Vicky Romanenko; Gangnes, Larry; Yeager, Judy
Cc: Billy London (blondon@fklmlaw.com); Omar Ochoa (OOchoa@susmangodfrey.com); Warren T. Burns; Frantangelo, Barbara K; Davis, Kenneth R.; Yeager, Judy
Subject: RE: Call regarding Delphi

Vicky:

The week of Feb 9 is not good for me except maybe Monday, Feb 9. I have mediation in LA later that week.

Our plan is to assemble a pricing package on a Toyota program and review that with the group at a meeting to be scheduled.

Joe

From: Vicky Romanenko [<mailto:Vicky@cuneolaw.com>]
Sent: Tuesday, January 13, 2015 12:01 PM
To: Papelian, Joseph E; Gangnes, Larry; Yeager, Judy
Cc: Billy London (blondon@fklmlaw.com); Omar Ochoa (OOchoa@susmangodfrey.com); Warren T. Burns; Frantangelo, Barbara K; Davis, Kenneth R.; Yeager, Judy
Subject: RE: Call regarding Delphi

Joe,

We will check with our groups and circle back as to the first week of February. Are you available the second week of February as well?

We don't mind foregoing a call this week, but we would like to schedule a call to follow up on last week's call, sometime before the meeting, so that we can get a better sense of what types of data and documents Delphi has, and what time period is covered. This will enable us to have a more informed discussion with you about what kind of production we can agree to. Are you available next week?

From: Papelian, Joseph E [<mailto:joseph.e.papelian@delphi.com>]
Sent: Tuesday, January 13, 2015 7:51 AM
To: Vicky Romanenko; Gangnes, Larry; Yeager, Judy
Cc: Billy London (blondon@fklmlaw.com); Omar Ochoa (OOchoa@susmangodfrey.com); Warren T. Burns; Frantangelo, Barbara K; Davis, Kenneth R.; Yeager, Judy
Subject: RE: Call regarding Delphi

Vicky:

I think the better approach is for us to prepare the presentation and schedule a date for us to meet the first week of February. Unfortunately, the key business folks are scheduled to be out of the country on business the last week of January. You can propose dates in the first week of February to Judy Yeager (my AdMin) who will circulate a meeting date. We will host the meeting at Delphi in Troy and open a line for those who cannot join in person.

Thanks,

Joe

From: Vicky Romanenko [<mailto:Vicky@cuneolaw.com>]

Sent: Monday, January 12, 2015 9:09 PM

To: Papelian, Joseph E; Gangnes, Larry; Yeager, Judy

Cc: Billy London (blondon@fkmlaw.com); Omar Ochoa (OOchoa@susmangodfrey.com); Warren T. Burns; Frantangelo, Barbara K; Davis, Kenneth R.

Subject: RE: Call regarding Delphi

We will check with our groups and circle back as to the date.

We would like to have the call go forward as well, but have conflicts at 11:30 am ET.

Are folks available on Thursday?

From: Papelian, Joseph E [<mailto:joseph.e.papelian@delphi.com>]

Sent: Monday, January 12, 2015 5:19 PM

To: Gangnes, Larry; Vicky Romanenko; Yeager, Judy

Cc: Billy London (blondon@fkmlaw.com); Omar Ochoa (OOchoa@susmangodfrey.com); Warren T. Burns; Frantangelo, Barbara K; Davis, Kenneth R.

Subject: RE: Call regarding Delphi

Larry:

I appreciate that Jan 29 would be a good date, but the key business folks will be out of the country. We're looking at the following week. Please let me know if that works.

Thanks,

Joe

From: Gangnes, Larry [<mailto:GangnesL@LanePowell.com>]

Sent: Monday, January 12, 2015 3:57 PM

To: Papelian, Joseph E; Vicky Romanenko; Yeager, Judy

Cc: Billy London (blondon@fkmlaw.com); Omar Ochoa (OOchoa@susmangodfrey.com); Warren T. Burns; Frantangelo, Barbara K; Davis, Kenneth R.

Subject: RE: Call regarding Delphi

I think it would be helpful to go ahead with the call at 11:30 a.m. ET Wed., if possible. Would Delphi be available for the meeting on Jan. 29? We will be in Detroit for the Jan. 28 status conf.

From: Papelian, Joseph E [<mailto:joseph.e.papelian@delphi.com>]

Sent: Monday, January 12, 2015 8:47 AM

To: Vicky Romanenko; Yeager, Judy

Cc: Billy London (blondon@fkmlaw.com); Omar Ochoa (OOchoa@susmangodfrey.com); Warren T. Burns; Frantangelo, Barbara K; Gangnes, Larry

Subject: RE: Call regarding Delphi

It's to review what we plan to collect and schedule a meeting with you probably sometime for the first week of February. If you prefer, let me know if you're available the first of Feb and we can schedule a date and dispense with the call. I'm including Larry on my response – thanks

From: Vicky Romanenko [<mailto:Vicky@cuneolaw.com>]

Sent: Monday, January 12, 2015 11:27 AM

To: Papelian, Joseph E; Yeager, Judy

Cc: Billy London (blondon@fkmlaw.com); Omar Ochoa (OOchoa@susmangodfrey.com); Warren T. Burns
Subject: Call regarding Delphi

Joe and Judy,

I have conferred with my co-counsel, copied here. We would like to propose 9:30 am CT/10:30 am ET, on Wednesday. Could you tell us a little bit more about what Delphi would like to discuss on the call?

Victoria Romanenko, Esquire
Cuneo Gilbert & LaDuca
507 C St. NE
Washington D.C.
20002
Phone: (202) 449-3958

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Exhibit H

Gangnes, Larry

From: Papelian, Joseph E <joseph.e.papelian@delphi.com>
Sent: Monday, February 23, 2015 12:22 PM
To: Gangnes, Larry
Cc: steven.cherry@wilmerhale.com; Laura.Taylor@aporter.com; Davis, Kenneth R.; Michael.Rubin@aporter.com; cyook@porterwright.com; Frantangelo, Barbara K
Subject: RE: Delphi/Antitrust Wire Harness

Larry:

At this point we do not want to release the slides Doug reviewed at our meeting. I recall you were taking copious notes. We can review this request once we reach agreement on the scope of discovery.

Thanks,

Joe

From: Gangnes, Larry [<mailto:GangnesL@LanePowell.com>]
Sent: Thursday, February 12, 2015 12:41 PM
To: Papelian, Joseph E
Cc: steven.cherry@wilmerhale.com; Taylor, Laura Cofer; Davis, Kenneth R.; Rubin, Michael A. (Michael.Rubin@APORTER.COM); cyook@porterwright.com
Subject: Delphi/Antitrust Wire Harness

Joe,

Thank you again for hosting the meeting with Doug Gruber at Delphi last week. It was very informative. In that regard, we would request a copy by email of Doug's presentation, which we will continue to treat as "Highly Confidential" information. We will also continue working with plaintiffs on a set of document/data requests to Delphi.

And please give our thanks to Doug for taking the time to speak with us.

Regards.

Larry Gangnes



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Exhibit I

Gangnes, Larry

From: Omar Ochoa <OOchoa@susmangodfrey.com>
Sent: Monday, June 22, 2015 11:22 AM
To: Gangnes, Larry; Papelian, Joseph E
Cc: Vicky Romanenko; 'blondon@fklmlaw.com' (blondon@fklmlaw.com); Demetrius Lambrinos; Steve Williams; Davis, Kenneth R.
Subject: RE: Auto Parts - Follow Up Discovery Requests to Delphi
Attachments: Auto Parts - Discovery Follow up Letter to Delphi.pdf

Hi Joe,

I wanted to follow up on the letter sent earlier this month. Is Delphi preparing a response? Are there issues we need to discuss? Please let us know.

Omar Ochoa | Susman Godfrey LLP
Office: 214.754.1913 Mobile: 956.500.3362

From: Gangnes, Larry [<mailto:GangnesL@LanePowell.com>]
Sent: Monday, June 08, 2015 12:44 PM
To: Omar Ochoa; Papelian, Joseph E
Cc: Vicky Romanenko; 'blondon@fklmlaw.com' (blondon@fklmlaw.com); Demetrius Lambrinos; Steve Williams; Davis, Kenneth R.
Subject: RE: Auto Parts - Follow Up Discovery Requests to Delphi

Omar & Joe,

This is to advise you that the Defendants in the Wire Harness class actions have no discovery requests to Delphi to add to plaintiffs' requests. We understand that Fujikura has a few limited requests it will be raising with Delphi in connection with the separate action filed by Ford.

Regards.

Larry Gangnes | Lane Powell PC
Shareholder | [Bio](#) | [vCard](#)
1420 Fifth Avenue, Suite 4200
P.O. Box 91302 | Seattle, WA 98111-9402
Direct: 206.223.7036 | Mobile: 206.779.6745
GangnesL@LanePowell.com | www.lanepowell.com

From: Omar Ochoa [<mailto:OOchoa@susmangodfrey.com>]
Sent: Monday, June 01, 2015 8:59 AM
To: Papelian, Joseph E
Cc: Vicky Romanenko; 'blondon@fklmlaw.com' (blondon@fklmlaw.com); Demetrius Lambrinos; Steve Williams; Gangnes, Larry
Subject: Auto Parts - Follow Up Discovery Requests to Delphi

Joe,

Please see the attached letter following up on our discovery requests to Delphi and let me know if you have any questions. Thank you.

Omar Ochoa | Susman Godfrey LLP

Office: 214.754.1913 Mobile: 956.500.3362

901 Main St. | Suite 5100 | Dallas, Texas 75202

HOUSTON • DALLAS • LOS ANGELES • SEATTLE • NEW YORK

oochoa@susmangodfrey.com | [Biography Page](#)

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Omar Ochoa
Direct Dial (214) 754-1913

E-Mail OOchoa@susmangodfrey.com

June 1, 2015

Larry S. Gangnes
Lane Powell PC
1420 Fifth Ave, Suite 4200
P.O. Box 91302
Seattle, WA 98111-9402
GangnesL@LanePowell.com

Joseph E. Papelian
Delphi Legal – Litigation
5725 Delphi Drive
Troy, MI 48098
Joseph.E.Papelian@delphi.com

RE: *In re Automotive Parts Antitrust Litigation*

Dear Sirs:

This is to follow up regarding the discovery requests given to Delphi on December 3, 2014 (the “Original Discovery Requests”). Based on discussions between Delphi and the Plaintiffs in the Automotive Parts Antitrust Litigation (the “Plaintiffs”), and the presentation provided by Delphi on February 5, 2015, the Plaintiffs have narrowed the discovery requests to the following:

(1) Sourcing Files:

- All documents included in sourcing files that are reasonably available and relate to Wire Harness Products sold from January 1, 1998 through the present. Based on information provided by Delphi, the sourcing files should include at least:

(a) Internal management review packages submitted to the Delphi Price Review Group (the “DPRG”) for approval of bids in

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response to Requests for Quotes (“RFQs”) for Wire Harness Products,

- (b) Requests for procurement from customers and quote packages sent to customers in response to procurement requests for Wire Harness Products, both for business Delphi did and did not win
 - (c) Supplier agreements entered into for successful bids
 - (d) Preferred supplier agreements, such as the Aligned Business Framework-related agreements.
 - (e) Internal and external communications, including e-mails—
 - (f) Financial and price ladder analyses, and
 - (g) Documents related to APR requests and other discount requests
- If the above elements do not exist in sourcing files, please advise the parties. The parties request that these materials be produced from other sources to the extent they do not exist in sourcing files.
 - Please also provide sufficient information to explain any fields used, codes used, methods used, or data contained in the sourcing files.

(2) Transactional Data and Documents:

- Transactional data that are kept in your SAP database (or other electronic databases if not available in SAP), are reasonably available, and concern your sales (or purchases from a contract manufacturer or supplier) of Wire Harness Products from January 1, 1996 through the present. To the extent available, each transaction record should include:
 - (a) product type;
 - (b) product description, including the model, make, and model year of the vehicle(s) for which the product was intended, geographic market for which the vehicle was intended, and whether the product was an original equipment or replacement part;
 - (c) total sales amount;
 - (d) quantity (units) (for each part number of Wire Harness Products sold and for each OEM model supplied, the quantity you sold your customers, including, but not limited to, OEMs and Tier 1,2 and 3 suppliers);
 - (e) unit price (for each part number of Wire Harness Products sold and for each OEM model supplied, the prices you charged your customers (including, but not limited to, OEMs and Tier 1,2 and 3 suppliers) and

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the prices your customers paid for Wire Harness Products, including any discounts, rebates, other payments, or other incentives you made or provided to your customers);

- (f) any costs (e.g., total cost, variable cost, materials cost, fixed cost, semi-variable cost, marginal cost, standard cost, research and development costs, engineering costs, plant and equipment investment for any plant or equipment used to produce the product) to you associated with the product;
- (g) sales date;
- (h) adjustments, including but not limited to, discounts, rebates, credits, and debits in the manner provided whether by product or by total sale;
- (i) descriptions of such adjustments;
- (j) currency and exchange rate;
- (k) product identifier or code;
- (l) part number for each product;
- (m) monetary components of the transaction beyond unit price (i.e., sales tax, shipping or delivery fees);
- (n) purchaser, including all Customer information, including, but not limited to, customer ID number, sold to name, sold-to address, and ship-to name and address (if not on invoice);
- (o) purchaser invoice-to (including bill-to and sold-to) and ship-to information, including all purchaser address information;
- (p) location(s) to which product and invoice were sent;
- (q) the legal entity making the sale;
- (r) location of sale;
- (s) invoice number;
- (t) all other information included on invoices issued during the relevant period;
- (u) all information related to any return or refund; and
- (v) all information related to rebates, discounts and free goods including information sufficient to tie them to sales transactions
- (x) plant and capacity utilization rates for any plant you used to produce Wire Harness Products

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- (y) quantity of each part number of Wire Harness Products you produced from any plant you used to product Wire Harness Products
- (z) Revenues (gross and net of any discounts and rebates) for each part number of Wire Harness Products you produced and for each customer to whom you sold Wire Harness Products
- (aa) Cost tables you prepared for your own use or for the use of a customer or potential customer
- (bb) Profits, losses, and margins (gross and net) for each type of Wire Harness Products you produced and for each customer for which you produced Wire Harness Products from any plant you used to produce Wire Harness Products;
- (cc) Financial records (e.g., general ledger data, balance sheets, income statements) relating to your Wire Harness Products business;
- (dd) Customer information, including, but not limited to customer number, products sold, quantity sold, net and gross price charged, sold-to name, and ship-to name and address, sales terms, ship to and sold to parent company, and identification of subsidiaries, affiliates, and joint ventures;
- (ee) Average cost of producing each type of Wire Harness Product for each customer and for each model vehicle
- (ff) Bids and other prices you submitted to your customers or potential customers (including, but not limited to, OEMs and Tier 1, 2, and 3 suppliers) to produce and supply Wire Harness Products

- Please also provide sufficient explanation of any fields used, codes used, methods used, or data contained in the transactional data requested above, including but not limited to, part decoders, customer code legends, or supplier code legends, adjustment code legends, or description code legends.

(3) Strategic and Business Plans

- Your business plans and strategic plans that are reasonably available and that relate to Wire Harness Products sold from January 1, 1998 through the present. To the extent any business or strategic plan covers other automotive products in addition to Wire Harness Products, the Wire

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Harness Product information can be separated and produced on its own provided that the information is self-contained and does not require referencing other product information for a full understanding of the Wire Harness Product business or strategic plan.

- Please also provide other information sufficient to explain any fields used, codes used, or data contained in the business or strategic plans.
-
- (4) Documents regarding Delphi's pricing policies and the training and instruction provided to employees regarding bidding and setting prices submitted to OEMs and other purchasers or potential purchasers, as well as determining discounts and price reductions for Wire Harness Products, from January 1, 1998 through the present.
 - (5) Documents comparing Delphi to its competitors with regard to prices, Wire Harness Product features, costs, RFQ results and profits from January 1, 1998 through the present.
 - (6) Studies, reports, or analyses in Delphi's possession comparing the prices of Wire Harness Products to the prices of vehicles from January 1, 1998 through the present.

Sincerely,

Omar Ochoa

Exhibit J

Gangnes, Larry

From: Papelian, Joseph E <joseph.e.papelian@delphi.com>
Sent: Thursday, July 30, 2015 10:53 AM
To: oochoa@susmangodfrey.com
Cc: vicky@cuneolaw.com; blondon@fkmlaw.com; DLambrinos@cpmlegal.com; swilliams@cpmlegal.com; Gangnes, Larry; Frantangelo, Barbara K
Subject: Wire Harness Auto Parts - Response to Discovery Requests
Attachments: KE30 Example.xlsx

I write in response to Omar Ochoa's letter of June 1, 2015, and as a follow up to the telephone conversation Barbara Frantangelo and I had with you on July 24, 2015. As we discussed, Delphi will conduct a reasonable search for responsive documents related to wire harness sales where they would most likely be located. Our responses will be limited to the following OEMS: General Motors, Ford, Fiat Chrysler, Daimler, Toyota, Honda and Nissan. These companies represent Delphi's main customers for wire harness sales. Your requests are noted below with ur responses below each request.

1. Sourcing Files:

- All documents included in sourcing files that are reasonably available and related to Wire Harness Products sold from January 1, 1998 through the present. Based on information provided by Delphi, the sourcing files should include at least:

We believe the majority of the requested information would be included in the DPRG packages. Delphi should have comprehensive DPRG packages for 2011 – 2014, and we agreed to search our records for additional DPRG packages from 2000 – 2010.

- a) Internal management review packages submitted to the Delphi Price Review Group (the "DPRG") for approval of bids in response to Requests for Quotes ("RFQs") for Wire Harness Products.

This information should be included in the DPRG packages.

- b) Requests for procurement from customers and quote packages sent to customers in response to procurement requests for Wire Harness Products, both for business Delphi did and did not win.

This information should be included in the DPRG packages.

- c) Supplier agreements entered into for successful bids.

Delphi will search for responsive Purchase Orders.

- d) Preferred supplier agreements, such as the Aligned Business Framework-related agreements.

This information would be retained by Delphi's customers.

e) Internal and external communications, including e-mails.

Responsive emails should be included in the DPRG packages.

f) Financial and price ladder analyses.

This information should be included in the DPRG packages.

g) Documents related to APR requests and other discount request.

This information should be included in the DPRG packages.

- If the above elements do not exist in sourcing files, please advise the parties. The parties request that these materials be produced from other sources to the extent they do not exist in sourcing files.

This information would be retained by Delphi's customers.

- Please also provide sufficient information to explain any fields used, codes used, methods used, or data contained in the sourcing files

2. Transactional Data and Documents:

As we discussed, Delphi began using the SAP program in approximately 2006. Delphi agrees to provide spreadsheets containing transaction data from 2006 – 2014. Attached to this email is a sample "KE30" report, which contains the following fields:

Customer
Customer Name
Ship-to
Ship-to party
Product
Product Description
Product Hierarchy
Product Hierarchy
Profit Ctr
Plant
Plant Name
Sales Revenue
PKG Amortized
Retro-billing
Total Net Sales
Sales Quantities
Std. Direct Labor
Std.Mfg.O/H-Fixed

Std. Direct Material
Allied Material
Ext Proc/Sub-contract
Mexico VA - 1
Mexico VA - 2
Cost of Sales
GROSS FACTORY PROFIT
MEMO Avg Sales Price
Total Material

3. Strategic and Business Plans

- Your business plans and strategic plans that are reasonably available and that relate to Wire Harness Products sold from January 1, 1998 through the present. To the extent any business or strategic plan covers other automotive products in addition to Wire Harness Products, the Wire Harness Product Information can be separated and produced on its own provided that the information is self-contained and does not require referencing other product information for a full understanding of the Wire Harness Product business or strategic plan.

We believe the information contained in Delphi's 5-Year Revenue Plan, which consists of specific programs by customer, will sufficiently respond to this request and will produce same.

4. Documents regarding Delphi's pricing policies and the training and instruction provided to employees regarding bidding and setting prices submitted to OEMs and other purchasers or potential purchasers, as well as determining discounts and price reductions for Wire Harness Products, from January 1, 1998 through the present.

Delphi will search for and produce responsive documents, including documents relating to Delphi's Delegation of Authority policy, training materials regarding antitrust, Delphi's Code of Conduct, and the DPRG process.

5. Documents comparing Delphi to its competitors with regard to prices, Wire Harness Product features costs, RFQ results and profits from January 1, 1998 through the present.

This information should be included in the DPRG packages.

6. Studies, reports, or analyses in Delphi's possession comparing the prices of Wire Harness Products to the prices of vehicles from January 1, 1998 through the present.

Delphi does not have any material related to this request.

We anticipate the collection of documents will take approximately two months, with an additional month to review, process and produce responsive documents. The cost to Delphi for collecting the documents is estimated at \$100,000. The cost for the review will be based on the number of documents collected. As I

mentioned during our call, we retain contract attorneys for a nominal fee to review the documents, and we will forward these costs on to you. We would need a retainer to start this effort.

We look forward to your response. Please call if you have any questions.

Thank you,

Joe
248 813-2535

From: Omar Ochoa [mailto:OOchoa@susmangodfrey.com]
Sent: Monday, June 01, 2015 11:59 AM
To: Papelian, Joseph E
Cc: Vicky Romanenko; 'blondon@fklmlaw.com' (blondon@fklmlaw.com); Demetrius Lambrinos; Steve Williams; Gangnes, Larry
Subject: Auto Parts - Follow Up Discovery Requests to Delphi

Joe,

Please see the attached letter following up on our discovery requests to Delphi and let me know if you have any questions. Thank you.

Omar Ochoa | Susman Godfrey LLP
Office: 214.754.1913 Mobile: 956.500.3362
901 Main St. | Suite 5100 | Dallas, Texas 75202
HOUSTON • DALLAS • LOS ANGELES • SEATTLE • NEW YORK
oochoa@susmangodfrey.com | [Biography Page](#)

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